



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2

October 18, 2018

BY ELECTRONIC MAIL

Robert Law, Ph.D.
de maximis, inc.
186 Center Street, Suite 290
Clinton, New Jersey 08809

Re: Draft 2012 Sediment Chemistry Background Data for the Lower Passaic River Study Area,
dated October 30, 2013

Dear Dr. Law:

The U.S. Environmental Protection Agency (EPA) has reviewed the *Draft 2012 Sediment Chemistry Background Data for the Lower Passaic River Study Area*, dated October 30, 2013, prepared by Windward Environmental LLC on behalf of the Cooperating Parties Group (CPG).

EPA is providing the enclosed comments on the CPG's revised Data Report with this letter in accordance with Section X, Paragraph 44(d) of the Agreement. Please proceed with the minor revisions to the Data Report within 30 days consistent with the enclosed comments. If there are any questions or clarifications needed, please contact me to discuss.

Sincerely,

A handwritten signature in dark ink, appearing to read "Diane Salkie", is positioned below the "Sincerely," text.

Diane Salkie, Remedial Project Manager
Lower Passaic River Study Area RI/FS

Cc: Zizila, F. (EPA)
Sivak, M. (EPA)
Hyatt, B. (CPG)
Otto, W. (CPG)

No.	Section	Comment
1	Page 4, Section 2.1, first paragraph, last sentence	Please change USEPA representative to “USEPA oversight personnel” or similar. In addition, oversight staff did not approve the selection of final sampling locations as the text suggests. All final selections were made by EPA. Please revise.
2	Page 71, First paragraph, first sentence	Please note the typographical error, “otal” and revise to read “Total”.
3	Page 123, Section 4.11	Third sentence lists 8 SQT and 16 chemistry-only locations, Table 4-14 lists 26 total results. The actual number of locations appears to be 9 SQT and 17 chemistry-only locations. Please revise.
4	Table 4-14	<ul style="list-style-type: none"> a. Please correct the units for 2,3,7,8-TCDD from µg/kg to ng/kg. b. The detection frequency ratio for 2,3,7,8-TCDD is incorrect as this chemical was not detected in every sample. c. It is understood that total PCB Aroclors and congeners can be calculated even when certain compounds were not detected, thus, each group has a detection frequency ratio of 26/26. Since total values could be calculated for Aroclors and congeners, the % frequency of detection should be 100% for Aroclors, not 85% as presented in the table. Please revise as appropriate. d. The detection frequency ratio for dieldrin is incorrect as it was not detected in every sample. e. Please revise the maximum concentration for total chlordane (ND=0) to read 63.5.
5	Appendix J	The original submission did not include the data validation reports, though they were submitted later. Be sure to include the data validation reports for the PCDD/PCDF in Appendix J.